Subject: POLREP #5
Western cell preparation / TxDOT ROW improvements continue
San Jacinto River Waste Pits TCRA
06ZQ
Channelview, TX
Latitude: 29.7944000 Longitude: -95.0625000

To: Ragan Broyles, Superfund Division
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From: Valmichael Leos, RPM
Date: 3/9/2011
Reporting Period: 02/22/11 - 03/07/11

1. Introduction

1.1 Background

Site Number:	06ZQ	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/2/2010
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	
Mobilization Date:	12/8/2010	**Start Date:**	12/8/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:	TXN000606611	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

RP lead CERCLA time critical removal action

1.1.2 Site Description

The site encompasses approximately 25 acres. The removal action is to stabilize the site by designing and constructing a physical protective barrier surrounding waste ponds 1 and 2 that temporarily abates the release of polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (and possibly PCBs) into the San Jacinto River, until the site is fllly characterized and a remedy is selected.

1.1.2.1 Location

The Site is in Harris County in the State of Texas. The Site itself has no specific street address. The Site is comprised of two waste ponds with three surface impoundments built in the 1960's. The ponds and impoundments are situated on a partially submerged 20-acre parcel of real property. The Site is located on the western bank of the San Jacinto River, in Harris County, Texas, immediately north of the Interstate Highway 10 (1-10) bridge over the San Jacinto River. Available information indicates the two waste ponds were built during 1965 by constructing berms within the estuarine area just north of what was then Texas State Highway 73 and is now 1-10, west of the main river channel, east of the City of Houston, between two unincorporated areas known as Channelview and

Highlands.

1.1.2.2 Description of Threat

The waste paper sludge was placed in the two ponds on the Site. Waste pond 1 is located on the western portion of the Site totaling 132,386 square feet. Waste pond 2 which consists of two surface impoundments are on the eastern portion of the Site totaling 46,182 square feet and 188,641 square feet respectively. Currently, the Site is inactive and approximately half of the Site's surface area, including the abandoned waste disposal ponds, is now submerged below the adjacent San Jacinto River's water surface. Waste pond I with one impoundment is partially submerged and waste pond 2 with the two impoundments is completely submerged in the San Jacinto River.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The primary hazardous substances documented at the Site are polychlorinated dibenzo-pdioxins and polychlorinated dibenzofurans. At the time of the signing of the Action Memo, dioxin concentrations as high as 41,300 parts per trillion have been found in sediment samples collected from the Site's disposal pond areas and hom river sediments near the Site. Sediments contaminated with high levels of dioxin have been found in the San Jacinto River both upstream and downstream from the Site due to tidal influences. Additional sediment samples were collected in compliance with the Action Memo, dioxin concentrations as high as 360,000 parts per trillion have been found in sediment samples collected from the submerged portion of the waste disposal ponds as well as dioxin concentrations as high as 3,660 parts per trillion action level in sediment sanlples collected outside the original 1966 berm placement for the two waste ponds indicating the release of dioxin from the original location of the waste ponds.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In accordance with the statement of work (SOW), in the EPA Administrative Order on Consent (AOC), the respondents International Paper Company Inc. (IP) and McGinnes Industrial Maintenance Corporation (MIMC) have 30 calendar days to begin construction for the time critical removal action. On November 8, 2010 the EPA finalized a work plan that details the construction of a temporary cap that will stabilize the release or threat of release of hazardous substances into the San Jacinto River.

2.1.2 Response Actions to Date

On January 5, 2011, EPA remedial project manager (RPM) Leos conducted a site inspection and documented that all on site field activities at the site have stopped. The Respondents have resumed some on site field activities on February 1, 2011 in preparation for implementing the time critical removal action.

On February 17, 2011, the respondents began the waterside placement of Armor Cap D rock on top of the eastern waste pit cell. The eastern cell is under approximately 4 foot water (depending on the seasonal tide) so placement of rock is being completed via barges stationed in the water alongside the eastern pit. Access road improvements along the Texas Department of Transportation (TxDOT) Right-of-Way (ROW) adjacent to the waste pits continue, preparation of office trailers for on site project management continues, and approximately 8,668 tons of Armor Cap D rock have been placed in the eastern cell. Estimate for armor cap placement Cap D is 33%, and cap placement for entire waste pit is approximately XX % .

On February 23, 2011, the respondents began the clearing and grubbing of the western cell in preparation for cap placement. The clearing and grubbing involves the use of a excavator that is removing large trees, shrubs, and vegetative debris that has grown on top of the western cell. All debris that may be potentially contaminated will be temporarily staged on top of the western cell. Any off site disposal of vegetative debris with visible contamination will be first sampled for disposal analysis and sent to the appropriate EPA approved subtitle C or subtitle D hazardous waste landfill.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Currently, EPA is working with International Paper Company Inc. and McGinnes Industrial Maintenance Corporation under an EPA issued Administrative Order on Consent.

2.2 Planning Section

2.2.1 Anticipated / Completed Activities

• Continued installing the guard rail posts along I-10 TxDOT ROW.

• Continued to experience turbidity curtain movement and maintenance along the perimeter of the Eastern Cell

• Continued transport to and installing Armor Cap D rock to Eastern Cell

• Received and reviewed draft survey cross sections of rock placed on top of Eastern Cell

• Discussed intensive water quality monitoring plan

• As of March 7, 2011 approximately 8,668 tons of Armor Cap D rock have been placed on top of the eastern cell.

2.2.1.1 Planned Response Activities

• Continue analytical laboratory testing of processed concrete and aggregate samples.

• USA Environment continued to revise site specific emergency response plan after input was received from local emergency responders in Channelview, Tx

• Continue developing on-site security plan to be used during active TCRA construction.

• Take additional steps to address Site security.

• Continue to prepare the Administration Site including:
  o Finish communication and sewer hookups for the job-site trailers.
  o Procure and install identification signs for the Administration Site.
  o Develop plan for managing Site visitors, including Plans for providing safety briefing and maintaining a visitor log.

• Continue to prepare the LaBarge Site including:
  o Complete barge preparation and loading of material for placement of armor cap.
  o Continue to supplement stockpile of aggregate as space becomes available.

• On the TxDOT ROW, continue construction of the road and related improvements described in the approved RAWP, and construct additional improvements in the ROW as permitted by the access agreement with TxDOT.

• On the waste pits:
  o Continue the clearing and grubbing of the western cell.
  o Commence installation of armor cap, provided weather delays do not significantly impact ongoing construction activities.